

**SUPERIOR COURT OF CALIFORNIA  
COUNTY OF SAN DIEGO  
DEPARTMENT 67 (CENTRAL) – JUDGE WILLIAM S. DATO**

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**TRIAL REQUIREMENTS**

Please bring the following items to the Friday Trial Call:

1. Joint Trial Notebook that includes the following:
  - a. Table of Contents.
  - b. Trial Briefs.
  - c. Motions In Limine / Oppositions with an index of the motions.
  - d. The Joint Witness Schedule listing all proposed witnesses, a short description as appropriate (e.g., “plaintiff’s son,” “treating internist,” etc.), whether the witness is expert or percipient, and a time estimate for the witness’s entire testimony. The sum of all the witness estimates should be consistent with the trial time estimate after adding 1 ½ days for jury selection, instructions, and closing arguments.
  - e. Joint Exhibit List (follow grid format on attachment to the Advance Trial Review Orders).
  - f. The Joint Statement of the Case.
  - g. Joint Trial Readiness Report.
  - h. Proposed Voir Dire questions counsel want the Court to ask.

- i. Jury Instructions. A complete set of proposed jury instructions in CACI numerical order followed by any special instructions. The instructions should be accompanied by an index (sample included) indicating which instructions are agreed to by all parties, which are proposed by plaintiff(s) and objected to by defendant(s), and which are proposed by defendant(s) and objected to by plaintiff(s).
- j. Special Verdict Form, preferably an agreed-upon form. It should be complete and without the firm name. The form should follow CACI as closely as possible and include all causes of action and all parties. If counsel are unable to agree, each side may submit a proposed form with the items in dispute highlighted. Counsel should understand that a failure to agree on a Special Verdict Form may delay the calling of a jury panel and beginning the trial.

*Note on Exhibits:* Please eliminate duplicative exhibits. Any exhibit that is duplicative will be identified throughout the trial by the first number used. Exhibits should be individually marked with brown exhibit tags. Multi-paged exhibits must be Bates-stamped or otherwise sequentially paginated. If you are submitting photographs, each photo should be on a separate page.

Please bring the following items on the first day of *actual trial* (not Trial Call):

1. Two sets of exhibit binders. An index should appear at the front of each binder. The original set is the official set to be used by the witnesses. The second set is for the Court to use.
2. Copies of deposition transcripts that may be referred to during trial.
3. An updated Joint Witness Schedule (if applicable).
4. An updated Joint Exhibit List (if applicable).